

**IN THE UNITED STATES DISTRICT COURT
FOR SOUTH DAKOTA**

RELIANCE TELEPHONE OF GRAND
FORKS INCORPORATED,
a North Dakota corporation,

and

RELIANCE SYSTEMS INC.,
a Nevada corporation,

Plaintiffs,

v.

YANKTON COUNTY, SOUTH DAKOTA,

and

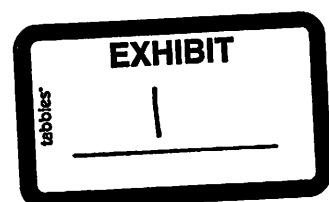
NETWORK COMMUNICATIONS
INTERNATIONAL CORP.,
a Texas corporation,

Defendants.

Civil No. 4:24-cv-04098-ECS

**PLAINTIFFS' LOCAL RULE
37.1 STATEMENT IN
SUPPORT OF ITS MOTION TO
COMPEL AGAINST
DEFENDANT NETWORK
COMMUNICATIONS
INTERNATIONAL CORP.**

Pursuant to District of South Dakota Local Rule 37.1, the undersigned lead counsel for Plaintiffs Reliance Telephone of Grand Forks Incorporated ("Reliance Telephone") and Reliance Systems Inc. ("Reliance Systems") (collectively "Plaintiffs") hereby certifies that he has engaged in good faith efforts to resolve this discovery dispute with counsel for Defendant Network Communications International Corp. ("NCIC") prior to filing Plaintiffs' Motion to Compel. Those efforts were not successful. Specifically, Plaintiffs' counsel and NCIC's counsel exchanged multiple communications, via email and in writing, attempting to resolve their differences. They further had conferences by telephone to try to resolve this discovery dispute.



All those efforts were unavailing. The parties' counsel agreed that further efforts would not be successful and that this issue was ripe for presentation to and resolution by the Court.

Dated: April 4, 2025.

/s/ Alan M. Anderson
Alan M. Anderson (MN Bar #149500)
(admitted *pro hac vice*)
L. Reagan Florence (MN Bar #0396468)
(admitted *pro hac vice*)
ALAN ANDERSON LAW FIRM LLC
11100 Wayzata Blvd., Suite 545
Minneapolis, MN 55305
Tel: 612-756-7010
Fax: 612-756-7050
Email: aanderson@anderson-lawfirm.com
rflorence@anderson-lawfirm.com

and

Patrick L. Sealey AT0007085
HEIDMAN LAW FIRM, P.L.L.C.
1128 Historic Fourth Street
P.O. Box 3086
Sioux City, IA 51102
Tel: (712) 255-8838
Fax: (712) 258-6714
Email: Patrick.Sealey@heidmanlaw.com

*Attorneys for Plaintiff Reliance Telephone of
Grand Forks Incorporated and Reliance
Systems Inc.*

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing pleading was served upon all parties to the above action by depositing the same in the U.S. Mail, postage pre-paid, to their respective mailing addresses disclosed on the pleadings or, in the event the party is represented by counsel, to their counsel; or notice of the filing of this instrument was sent by e-mail, via CM/ECF, to all parties on the service list who have registered to receive service by e-mail over CM/ECF, on April 4, 2025.

/s/ Alan M. Anderson